NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT

ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET

V. : AT WATERBURY

ALEX EMRIC JONES, ET AL. : APRIL 8, 2022

NO. X06-UWY-CV18-6046437-S : SUPERIOR COURT

WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

V. : AT WATERBURY

ALEX EMRIC JONES, ET AL. : APRIL 8, 2022

NO. X06-UWY-CV-18-6046438-S : SUPERIOR COURT

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### PLAINTIFFS' RESPONSE TO THE JONES DEFENDANTS' MOTION FOR ORDER (DN 796 & 797)

The Court's contempt fines were effective. Mr. Jones sat for deposition on April 5-6. However, Mr. Jones's contempt for fairness and the Court's authority continues. Mr. Jones is now abusing the Court's protective order by designating the entire deposition as confidential, even as he and his attorney publicly disclose their version of what happened at his deposition in a cynical effort to shape public opinion around his false claim that this litigation part of a larger plot to attack the First Amendment.

At the conclusion of the first day of his deposition, Mr. Jones, who brought a film crew to Connecticut, filmed and uploaded a video to Infowars.com in which he and his counsel discussed

what was asked at the deposition and their view of the purpose of the questioning. Mr. Jones described his deposition as "just next-level, like a hallucination or something. They start out with demonizing me that I believe in a new world order and a global government...." *Id.* (timestamp 0:20.) The plaintiffs cannot respond to this because Mr. Jones designated the transcript confidential. After describing at length why in his view he is the true victim in this case, Mr. Jones stated that he had his attorney here, to "break down and talk about some of what happened today, because people really want to know about this...." *Id.* (timestamp 3:05). Attorney Pattis said:

It was a long and difficult day.... Alex was asked a series of questions, not as many of them about Sandy Hook as I would have expected. There were questions about events unrelated to Sandy Hook, and it struck me as a broad, wholesale attack on Mr. Jones's and Infowars's questioning of narratives. It struck me that the attack here was not on behalf of the parents of Sandy Hook but on behalf of people far, far different... I heard questions about a reporter, Dan Bidondi, a former reporter, who asked questions of public officials... Alex wasn't perfect today, but he did a good job....

*Id.* (timestamp 7:05). Again, the plaintiffs cannot respond to this because of Mr. Jones's confidentiality designation.

On the second day of his deposition, on a deposition break, Mr. Jones exited the building where the deposition was being held and gave an interview to a Channel 12 reporter. The reporter asked, "can you tell us at all about what you are talking about in there?" Mr. Jones responded, "we can't get into what's happening inside there because right now they've marked the deposition as confidential and so have we." It is false that the plaintiffs claimed Mr. Jones's deposition as confidential pursuant to the protective order. Only Mr. Jones has done that, and it

<sup>&</sup>lt;sup>1</sup> <u>https://banned.video/watch?id=624cd547bc0dcd52c20339d0</u>, Ex. A. (A copy of this video has been downloaded and is being submitted to the Court as an exhibit.)

<sup>&</sup>lt;sup>2</sup> https://battleplan.news/watch?id=624e514e3953a857ac1e650a (timestamp 0:03), Ex. B. (A copy of this video has been downloaded and is being submitted to the Court as an exhibit.)

was done over the plaintiffs' objection.

Mr. Jones is using the confidentiality designation available to him through the Court's protective order as a sword and a shield. He is using the protective order to hide what really happened in his deposition for as long as possible, while at the same time disclosing his version of the deposition to his audience.<sup>3</sup> When Mr. Jones's counsel claimed the designation, the plaintiffs indicated to him that the designation was made in bad faith. Mr. Jones persists in the designation.<sup>4</sup> These actions are an abuse of process and a further sign of his ongoing contempt.<sup>5</sup>

The plaintiffs cannot further discuss the content of the Alex Jones April 5-6 deposition in this public filing because of Mr. Jones's bad faith claim of confidentiality. The plaintiffs note that the Jones defendants have not submitted those transcripts to the Court to support their position that Mr. Jones's contempt is purged. And, as noted in Mr. Jones's supplemental filing, Mr. Jones's deposition is not yet complete.

There is no dispute that the fines levied to cause Mr. Jones to appear for his deposition were potentially subject to reimbursement. However, there is no reason for the Court to act on an emergent basis to address that issue, given that it was Mr. Jones's defiance of Court orders that

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<sup>&</sup>lt;sup>3</sup> At the conclusion of the video, Mr. Jones informed his audience that "we've got nine lives thanks to your prayers and support and thanks to you supporting infowarsstore.com. This fight is your fight. This fight is my fight. We're together. God bless, and we'll have more reports for you tomorrow. Good luck." Ex. A (timestamp 11:27).

<sup>&</sup>lt;sup>4</sup> Mr. Jones's counsel initially indicated that a decision regarding whether Mr. Jones would maintain the designation will be forthcoming at 5 p.m. today (Friday, April 8). Mr. Jones's counsel now informs the plaintiffs that he will not make that determination today because he wishes to review the deposition transcript.

<sup>&</sup>lt;sup>5</sup> The operative protective order (DN 711.00) contains a provision concerning the ordinary resolution of objections to confidentiality designations through a meet-and-confer process. *Id.* ¶ 17. Mr. Jones's invocation of the protective order after he filed himself and his counsel describing their version of what happened at the deposition is an abuse of the protective order itself, not merely an objectionable designation.

caused the need for fines in the first place, that Mr. Jones continues to abuse process, and that the Jones defendants have not submitted the transcripts of the deposition to the Court.

### THE PLAINTIFFS,

By: /s/ Alinor C. Sterling

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#### **CERTIFICATION**

I certify that a copy of the above was or will immediately be mailed or delivered electronically or nonelectronically on this date to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

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/s/ Alinor C. Sterling

ALINOR C. STERLING CHRISTOPHER M. MATTEI MATTHEW S. BLUMENTHAL

# **EXHIBIT A**

The April 5, 2022 video "Alex Jones Responds To Sandy Hook Lawsuit Deposition" is being submitted to the Court on a flash drive. The link to the video is:

https://banned.video/watch?id=624cd547bc0dcd52c20339d0

## **EXHIBIT B**

The April 6, 2022 video "War Against The 1st Amendment.' Alex Jones Appears for Questioning in Sandy Hook Lawsuit" is being submitted to the Court on a flash drive. The link to the video is: <a href="https://battleplan.news/watch?id=624e514e3953a857ac1e650a">https://battleplan.news/watch?id=624e514e3953a857ac1e650a</a>